

AFFIDAVIT

STATE OF MISSOURI     )  
                              )   ss  
COUNTY OF CASS        )

I, James B. Stinnett, Special Agent (SA) of the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and say:

1) I am currently assigned to violent crimes investigations in the Kansas City Division of the FBI. I have been an SA with the FBI for approximately 1 year. Prior to joining the FBI, I was employed as a police officer in the state of Tennessee for seven years.

2) This affidavit is in support of a Complaint for Scott Dujuan Hazel, black male, date of birth XX XX, 1987, Social Security Account Number (SSN) XXX-XX-2980, 5'10", 207 pounds, for violation of Title 18 of the United States Code, Section 2113 (a), Bank Robbery.

3) On November 30, 2005, your affiant reviewed a Raymore, Missouri Police Department report written by Officer Lawrence Loney. This report summarized Officer Loney's interview of Cheryl L. Osborne, Assistant Vice President, Allen Bank and Trust Company (ABTC), 1000 Foxwood Drive, Raymore, Missouri. Officer Loney's report documented the following information:

A) On November 30, 2005, just before 5:00 p.m., Osborne was standing in the ABTC lobby, preparing to lock the bank's doors for the day. A black male (robber) then entered the lobby area of the bank and announced, "this is a hold-up". The robber ordered the bank's employees and other lone occupant to sit down on the floor and keep their hands elevated. The robber was in possession of a knife which he brandished in his right hand, and a small blue nylon bag with white ribbing in his left hand. The robber advised that the blue nylon bag was a bomb and he would detonate the device if anyone failed to comply with his wishes. The robber repeated on several occasions, "this is for real."

B) The robber demanded all of the money and specified that one particular teller provide him with money. Osborne identified ABTC teller Tara Schwertner as the teller who eventually complied with the robber's demands. The robber provided Schwertner with a "Gap" bag, which had a draw string, and ordered Schwertner to place the money in the bag. The robber then inquired about the vault, after which Osborne told the robber that the vault was on a time lock and could not be opened at this particular time. The robber then asked the bank employees about the owner of the black Ford Expedition that was parked in the bank parking lot. None of the bank employees identified the owner of the black Ford Expedition. The robber then inquired about the various other cars in the parking lot, at which time Schwertner volunteered the keys to her vehicle, a white Toyota Camry. The robber took possession of Schwertner's keys and then left the bank. Osborne advised that for some unknown reason, the robber was apparently unable to start Schwertner's car.

C) Osborne described the robber as a black male in his late teens or early 20's, approximately 5'10", approximately 230 pounds, wearing black sweat pants, black tennis shoes, black hooded jacket, with a facial covering consisting of a nylon material.

D) Osborne believed she recognized the robber's voice, as well as his build, because of the robber's past history of being a customer at the bank. Osborne believed the past customer's identity to be Scott Dajuan Hazel.

4) On November 30, 2005, Officer Travis George of the Belton, Missouri Police Department interviewed Phyllis E. Abreo, as part of the law enforcement response and investigation of the November 30, 2005, robbery of Allen Bank and Trust Company, 1000 Foxwood, Raymore, Missouri. Abreo advised the following during the interview:

A) Abreo was present in her Raymore, Missouri living room on the evening of November 30, 2005 after the time of the Allen Bank and Trust Company robbery when she heard a male's voice, which she described as loud "yelling". Abreo subsequently walked to a nearby bedroom and looked out the bedroom window, which overlooked Kaycee Drive. Abreo immediately observed a black male who was dressed in black clothing, crouched down beside Abreo's vehicle in the driveway of her residence. The black male was talking on a cellular telephone and still "yelling in a loud manner". Abreo then verbally advised her husband that she thought the black male was attempting to burglarize her vehicle.

B) The black male shortly thereafter observed Abreo in the residence/bedroom window and began to run westerly on Kaycee Drive. Abreo observed a dark colored "bag" in the man's right hand as he ran away from her residence. Abreo described the robber as approximately 5'10", heavy set, wearing a black hooded sweatshirt, black pants, and something black on his head, possibly a dew rag. The black male also might have had a short mustache. The black male eventually turned north and ran between some houses that are currently under construction.

C) Abreo then moved from the bedroom to the front of the residence. Shortly thereafter, Abreo observed a brown Chevrolet Suburban travel east on Granada Street, and then stop at the intersection with Seaton Street. Abreo observed the black male run east through the yard of a Granada Street residence, approach the brown Chevrolet Suburban, and then enter the rear passenger's side of the Suburban. A MapQuest inquiry by SA Casey Brown revealed a distance of .32 miles between the intersection of Granada and Seaton, and ABTC.

5) On November 30, 2005 at approximately 8:50 p.m., your affiant interviewed Scott Dujuan Hazel at the Raymore, Missouri Police Department. This portion of Hazel's interview was a non-custodial interview situation. Mr. Hazel had been asked to voluntarily appear at the police station pursuant to police request. During a portion of this interview, Hazel advised that he was picked up from school on November 30, 2005 by a friend, a juvenile male, who was driving a brown Tahoe.

6) On November 30, 2005, the juvenile male referred to in paragraph 5 of this affidavit was interviewed by Cass County Deputy Juvenile officer, Kristi Kertelstall, FBI Special Agent Julia M. Schulte, and Raymore, Missouri Police Department Detective Kristin Paulson. This interview was conducted with the consent of the male juvenile's mother, as well as after both the juvenile and his mother had waived the juvenile's Miranda Rights. The male juvenile advised the following during the interview:

A) The male juvenile and Scott Dujuan Hazel departed Raymore-Peculiar High School together on November 30, 2005, at approximately 4:00 p.m. The juvenile male and Hazel subsequently drove to Hazel's residence, at which time Hazel told the juvenile male that he is about to make a lot of money, and it has to do with a bank. Hazel then offered the male juvenile three thousand dollars to drive Hazel to and from the bank. Hazel did not specifically tell the juvenile male that he planned to rob a bank. Hazel subsequently changed into black sweat pants, a black hooded sweatshirt, and black shoes.

B) Hazel and the male juvenile then departed Hazel's Raymore, Missouri, residence in the male juvenile's gold Chevrolet Tahoe. While en route to the bank, Hazel placed something black in color on his head, and also eventually placed brown gloves, which contained some type of latex/rubber material, on his hands. Upon approaching the bank, Hazel pulled a black mask down over his head, and told the male juvenile to drive around for four or five minutes, and then pick him up from the area of the bank. The male juvenile observed Hazel carrying something in his pocket that appeared to be a blue bag. The male juvenile then drove around the area of the bank, until Hazel contacted him via cellular telephone, advising the juvenile male to come pick him up. The male juvenile next observed Hazel running across a field directly behind the bank, while carrying two blue bags which appeared to be Dillards shopping bags. Hazel then entered the male juvenile's gold Chevrolet Tahoe and advised the male juvenile to, "hit the highway". While driving away from the area of the bank, the male juvenile observed Hazel in possession of a large amount of United States currency.

C) Hazel directed the male juvenile to a Grandview, Missouri apartment complex, where Hazel changed his clothing, eventually placing the bank robbery related clothing in a green bin/tub. The male juvenile assisted Hazel in carrying the green bin/tub, as well as other items, into a second floor apartment. The male juvenile ultimately left Hazel at the Grandview, Missouri apartment complex.

D) The male juvenile was aware that ABTC was the victim bank in this matter.

7) On December 1, 2005, your affiant interviewed Scott Dujuan Hazel regarding his involvement in the ABTC robbery. After being advised of his Miranda Rights, and signing a written waiver of these rights, Hazel admitted his involvement in the ABTC robbery. Hazel also provided a written statement concerning his commission of the ABTC robbery. Hazel advised the following specifics regarding his commission of the ABTC robbery:

A) Hazel admitted to having utilized a pair of scissors, as well as a blue nylon bag as a hoax bomb device, in order to carry out the ABTC robbery.

B) Hazel admitted to having committed the ABTC bank robbery with the assistance of the above-mentioned male juvenile.

C) Hazel admitted that during the ABTC robbery, he ordered the bank's occupants to put their hands in the air, and have a seat. Hazel also said he received money from two or three teller drawers during the ABTC robbery.

8) On December 1, 2005, at approximately 12:20 a.m., Raymore, Missouri Police Department Detective Dave Billings recovered the following items from a dumpster, located near apartment #279, at 11911 Holiday Drive, Grandview, Missouri.

- A) "Ray-Pec" black long-sleeved shirt
- B) black sweat pants
- C) Navy blue zip-up hooded sweat shirt
- D) black "Dew" rag and two black scarf type items
- E) latex/rubber gloves fastened around brown material, possibly brown gloves
- F) one pair scissors with black handle, with word "Scott" written on handle
- G) black pair of PUMA tennis shoes
- H) blue container/bag containing a blue flashlight with unknown item fastened to the flashlight, possible hoax bomb device

9) On November 30 and December 1, 2005, SA Michael G. Mrachek interviewed Ricky A. Johnson Jr. Johnson advised the following during the interview:

A) Johnson currently resides in apartment #xxx, xxxx xxxx xx, Grandview, Missouri.

B) On November 30, 2005, at approximately 2:50 p.m., Johnson received a telephone call from Scott Dajuan Hazel, wherein Hazel asked Johnson if he (Hazel) could reside with Johnson in his apartment for a short period of time. Johnson has known Hazel for several years and is very familiar with him. Johnson told Hazel that he would allow him (Hazel) to live in his apartment for a short time. Additionally, Hazel told Johnson that he would be bringing various items over to the apartment later in the day.

C) Although Johnson was working at a Walmart store during the later afternoon and early evening of November 30, 2005, Johnson was aware from telephonic conversations with his roommate, Martes Allen, that Hazel had visited his apartment between 4:30 and 6:00 p.m.

10) On November 30 and December 1, 2005, SA Michael G. Mrachek interviewed Martes D. Allen, a person who resides at apartment #xxx, xxxx xxxx xx, Grandview, Missouri, with Ricky A. Johnson. Allen confirmed that Johnson's friend, Scott (Last Name Unknown-LNU), a black male, visited apartment #xxx sometime between 4:00 and 6:00 p.m. on November 30, 2005. During this visit, Scott LNU showed Allen an amount of United States currency, but did not elaborate on how he obtained the money.

11) Tara Schwertner, Teller, ABTC, advised that the total loss to ABTC as a result of the November 30, 2005, robbery was \$6,610.

12) Jane Neal, Cashier, ABTC, advised that ABTC is insured by the Federal Deposit Insurance Corporation (FDIC) under insurance number 8583, date of charter, January 1, 2001.

13) The foregoing information and evidence indicates that Scott Dajuan Hazel, on November 30, 2005, did by force take from the person and presence of Cheryl L. Osborne and Tara Schwertner, employees of Allen Bank and Trust Company, 1000 Foxwood, Raymore, Missouri, the deposits of which were then insured by the FDIC, approximately \$6,610 in United States currency, belonging to and in the care, custody, control, management, and possession of such bank.

The foregoing is true and correct to the best of my information and belief.

---

James B. Stinnett  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this 1st day of December 2005.

---

ROBERT E. LARSEN  
United States Magistrate Judge